

MEMO ENDORSED

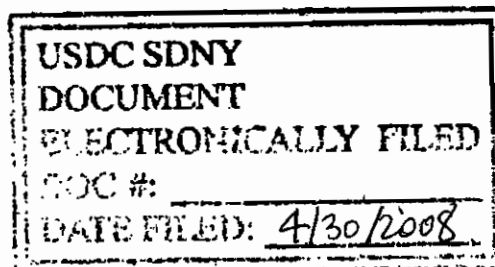
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Via Telecopier

April 30, 2008

The Honorable Denny Chin
United States District Court
Southern District of New York
Room 1020
500 Pearl Street
New York, New York 10007-1312



Re: American Motorists Insurance Company, et al. v.
MTS Insurance Services, Inc., et al.
08 Civ. 3320 (DC)

Dear Judge Chin:

Our firm represents the defendants in the above-captioned action. I write to respectfully request a thirty (30) day extension of defendants' time to answer and/or move with respect to the Complaint (from April 30 to May 30, 2008), as our firm was just recently retained by defendants.

Regrettably, although I requested such a routine extension from plaintiffs' counsel, counsel has not consented to the requested extension. Specifically, following an introductory call to plaintiffs' counsel earlier last week when our firm was first retained, by e-mail dated Friday, April 25, 2008 (Exhibit A), I requested a 30-day extension to answer from Samuel J. Thomas, plaintiffs' counsel, and forwarded a stipulation to this effect for his signature. Although Mr. Thomas and I have since exchanged a series of e-mails (Exhibit B), in which I explained the need for the requested extension and asked that Mr. Thomas respond to my request by the close of business yesterday, he has not done so.

I respectfully request that the 30-day extension we seek be granted, given that (1) our firm was just recently retained by defendants; (2) this is the first extension request in a case that was filed on April 3, and my clients were served on April 10, 2008; and (3) plaintiffs will not be prejudiced in any respect whatsoever, since this action is in its infancy.

Thank you for your consideration of this matter.

Respectfully submitted,


Helen Gavaris

cc: Samuel J. Thomas, Esq. (via fax)
Plaintiffs' counsel

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NY717227.1
A limited liability partnership including professional corporations

Approved.

SO ORDERED.



WDS 4/30/08